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April 4, 2016

**VIA ECF**

Honorable Lorna Schofield  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

RE: Jody Kriss, et al. v. Bayrock Group LLC, et al., Case No. 10 CV 3959  
(LGS)(FM) ("Kriss I")

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Dear Judge Schofield:

We represent Frederick Oberlander, Esq. in the above referenced matter ("Oberlander"). As a result of an emergency hospitalization of our client, we write to request a brief extension of time to file our reply response to the Court's February 1, 2016 Order in which the Court, among other things, directed our client to show cause why the Court should not impose certain sanctions on our client. The Court directed the parties to file simultaneous reply responses today.

Our client informs us that he has been taken to the hospital this morning with an emergency medical condition which will prevent him from assisting in the completion of and approving the final version of our reply response. Naturally, our response is near completion, however, due to his medical condition which became acute over the last 24 hours, our client cannot review and approve the final content of our submission.

We anticipate and hope that his condition will stabilize in the relatively short term and, accordingly, respectfully request a brief 48 hour extension to Wednesday April 6, 2016 to make our submission. We, of course, would have no objection to the Court extending all parties' time correspondingly.

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We thank the Court for its kind consideration of this request and this matter.

Respectfully submitted,

Simon Miller

cc: Bradley D. Simon, Esq. (by ECF and email)  
Richard Lerner, Esq. (by ECF and email)  
Walter Saurack, Esq. (by ECF and email)  
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